

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 20-243 (JRT/HB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. JOSHOAMEI DEANGELO RICHARDSON,

a/k/a "Yoshi,"

a/k/a "Yodaa Ballard,"

2. JAMES BROCK WILLIAMS, JR.,

a/k/a "Jackboy,"

a/k/a "J,"

3. ISAIAH STACY ALSTAD,

a/k/a "Zay,"

a/k/a "Lil Zay,"

a/k/a "Zay Money,"

4. CLIFTON GERMAINE WALKER, JR.,

a/k/a "K-Killa,"

a/k/a "Clif,"

5. JORDAN SYDNEY SHAMAH RHODES,

a/k/a "2 3,"

6. ERIC TROY BALLARD, JR.,

a/k/a "Donk,"

a/k/a "Lil Donk,"

a/k/a "Tray Williams,"

Defendants.

) SUPERSEDING INDICTMENT

) 18 U.S.C. § 2

) 18 U.S.C. § 922(g)(1)

) 18 U.S.C. § 922(g)(3)

) 18 U.S.C. § 924(a)(2)

) 18 U.S.C. § 924(c)(1)(A)(ii)

) 18 U.S.C. § 924(d)(1)

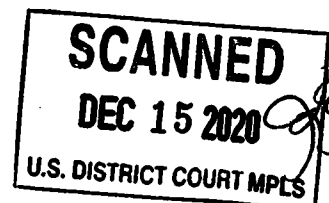
) 18 U.S.C. § 924(o)

) 18 U.S.C. § 982(a)(5)

) 18 U.S.C. § 2119(1)

) 21 U.S.C. § 853(p)

) 28 U.S.C. § 2461(c)



THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Use, Carry, and Brandish Firearms
During and in Relation to a Crime of Violence)

From at least in or about May 2020, through the issuance of this Superseding Indictment, in the State and District of Minnesota, the defendants,

JOSHOAMEI DEANGELO RICHARDSON, a/k/a "Yoshi," a/k/a "Yodaa Ballard,"
JAMES BROCK WILLIAMS, JR., a/k/a "Jackboy," a/k/a "J,"
ISAIAH STACY ALSTAD, a/k/a "Zay," a/k/a "Lil Zay," a/k/a "Zay Money,"
CLIFTON GERMAINE WALKER, JR., a/k/a "K-Killa," a/k/a "Clif,"
JORDAN SYDNEY SHAMAH RHODES, a/k/a "2 3," and
ERIC TROY BALLARD, JR., a/k/a "Donk," a/k/a "Lil Donk," a/k/a "Tray Williams,"

knowingly and intentionally conspired with each other, and with others known and unknown to the grand jury, to knowingly and unlawfully use, carry and brandish firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, aiding and abetting carjacking, as alleged in Count 6, Count 8, and Count 10 of this Superseding Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

BACKGROUND AND PURPOSE OF CONSPIRACY

1. During the time-frame of the conspiracy, the defendants maintained active membership in the street gang or clique known as the "Top 5." The purpose of the Top 5 gang or clique is to make money for its members through criminal acts, including thefts, robberies, and distribution and sale of controlled substances. Top 5 members will sometimes display an orange bandana and/or use the words "TOP 5" in writings and/or social media posts to identify their membership in and affinity for the Top 5.

2. Proceeds of the money obtained through the commission of criminal acts often would be distributed among the Top 5 members.

3. In order to effectuate and commit criminal acts, members of Top 5 would acquire, share, trade, and possess firearms, and then use, carry, and brandish firearms during the commission of the criminal acts to help carry out and accomplish the criminal acts. Top 5 members would also use, carry, and possess firearms to commit acts of violence against rival gang members, including shootings and assaults.

4. Top 5 members would sometimes meet to discuss and plan out the commission of these criminal acts and would often work in concert with and assist one another to commit the criminal acts.

5. Top 5 members would also often use social media platforms, such as Facebook, to, among other things, discuss plans for commission of criminal acts, recruit other Top 5 members to assist in the commission of criminal acts, and inform other Top 5 members that criminal acts had been committed and/or money had been obtained as a result of committing criminal acts.

6. Top 5 members would also often use social media platforms, such as Facebook, to tout the power, prestige, and status of Top 5 and/or its members, by posting photographs, videos, or both, of Top 5 members displaying, among other things, cash, firearms, controlled substances, or a combination thereof.

OVERT ACTS

During and in furtherance of the conspiracy, the defendants committed the following overt acts, among others:

7. On May 21, 2020, Defendants Jordan Sydney Shamah Rhodes and Eric Troy Ballard, Jr., jointly possessed the following firearms while driving in Saint Paul, Minnesota: a Glock, model 23 Generation 4, .40-caliber semiautomatic pistol, bearing serial number SFS225, and an Armscor, model M1911-A1, .45-caliber semiautomatic pistol, bearing serial number RIA1521636.

8. On the night of July 10, 2020, occupants of a four-door black sedan several times drove past an apartment residence on Van Dyke Street in Saint Paul, Minnesota, where a rival to the Top 5 resides, and fired shots at the residence, shooting out a sliding glass door. One of the firearms used appeared to be wrapped in an orange bandana. Later that same night, Defendant Jordan Sydney Shamah Rhodes possessed a Ruger, model P97DC, .45-caliber semiautomatic pistol, bearing serial number 66340544, with an orange bandana wrapped around the grip of the pistol.

9. In the early morning of July 11, 2020, Defendant Isaiah Stacy Alstad while operating a four-door black sedan motor vehicle in Saint Paul, Minnesota, possessed a Remington, model 1911R1, .45-caliber semiautomatic pistol, bearing serial number RHH046820. Two orange bandanas were also found inside the vehicle.

10. On August 25, 2020, Defendant Joshoamei Deangelo Richardson possessed a Sig Sauer, model P320, 9mm semiautomatic pistol, bearing serial number 58B081654.

11. On August 25, 2020, at approximately 2:30 a.m., Defendants James Brock Williams, Jr., and Eric Troy Ballard, Jr., and others carjacked a 2006 black BMW 530i, with Minnesota Plate 170 WAU, near the 1200 block of Jackson Street, in Saint Paul, Minnesota, at gunpoint and physically assaulted the driver of the vehicle.

12. On August 25, 2020, beginning at approximately 6:15 a.m., Defendants Joshoamei Deangelo Richardson, James Brock Williams, Jr., Isaiah Stacy Alstad, Clifton Germaine Walker, Jr., and Eric Troy Ballard, Jr., and others filmed several videos and took photographs of themselves brandishing firearms and displaying cash on a dead-end street near the 1500 block of Ames Avenue East, in Saint Paul, Minnesota, while standing in and around the stolen BMW 530i and two other vehicles. Many of the videos and photographs were posted on Defendant Walker's social media account.

13. On August 25, 2020, at approximately 6:50 a.m., Defendants Joshoamei Deangelo Richardson, James Brock Williams, Jr., Isaiah Stacy Alstad, Clifton Germaine Walker, Jr., and Eric Troy Ballard, Jr., carjacked a 2012 gray Dodge Charger, bearing Minnesota license plate 567 XRT, from the parking lot of a Subway restaurant at 376 White Bear Avenue, at gunpoint.

14. On August 25, 2020, at approximately 9:00 a.m., Defendants Joshoamei Deangelo Richardson, James Brock Williams, Jr., Isaiah Stacy Alstad, and Eric Troy Ballard, Jr., carjacked a 2012 blue Subaru Outback, with Minnesota Plate CZY 466, at gunpoint, from Maria Avenue near Metropolitan State University, in Saint Paul, Minnesota.

15. On August 25, 2020, Defendant James Brock Williams, Jr., possessed an SCCY, model CPX-2, 9mm semiautomatic pistol, bearing serial number 442418.

16. On August 26, 2020, Defendant Clifton Germaine Walker, Jr., possessed a Sig Sauer, model P320, 9mm semiautomatic pistol, bearing serial number 58B081654.

17. On October 12, 2020, Defendants Isaiah Stacy Alstad, James Brock Williams, Jr., Jordan Sydney Shamah Rhodes, and Eric Troy Ballard, Jr., possessed a variety of controlled substances, cash, and the following four firearms, while in a hotel in Saint Paul, Minnesota: (1) a Smith & Wesson, model M&P 9, 9mm semiautomatic pistol, bearing serial number HMY1526, with an extended magazine attached; (2) a Glock, model 22, .40-caliber semiautomatic pistol, bearing serial number GCY345; (3) a Girsan, model MC 1911 SC, .45-caliber semiautomatic pistol, bearing serial number T636819BF00181, and (4) a Glock, model 22, .40-caliber semiautomatic pistol, bearing serial number AFR619US.

All in violation of Title 18, United States Code, Section 924(o).

COUNT 2

(Unlawful Controlled-Substance User in Possession of Firearms)

On or about May 21, 2020, in the State and District of Minnesota, the defendant,

JORDAN SYDNEY SHAMAH RHODES, a/k/a “2 3,”

being an unlawful user of any controlled substance, did possess, in and affecting interstate and foreign commerce, the following firearms: (1) a Glock, model 23 Generation 4, .40-caliber semiautomatic pistol, bearing serial number SFS225; and (2) an Armscor, model M1911-A1, .45-caliber semiautomatic pistol, bearing serial number RIA1521636, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 3

(Unlawful Controlled-Substance User in Possession of a Firearm)

On or about July 10, 2020, in the State and District of Minnesota, the defendant,

JORDAN SYDNEY SHAMAH RHODES, a/k/a "2 3,"

being an unlawful user of any controlled substance, did possess, in and affecting interstate and foreign commerce, the following firearm: a Ruger, model P97DC, .45-caliber semiautomatic pistol, bearing serial number 66340544, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 4

(Felon in Possession of a Firearm)

On or about July 11, 2020, in the State and District of Minnesota, the defendant,

ISAIAH STACY ALSTAD, a/k/a "Zay," a/k/a "Lil Zay," a/k/a "Zay Money,"

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely,

Crime	Jurisdiction of Conviction	Date of Conviction (in or about)
Theft of Motor Vehicle	Ramsey County	October 2018
Fifth-Degree Controlled Substance Possession	Hennepin County	December 2018

and knowing he had been convicted of least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Remington, model 1911R1, .45-caliber semiautomatic pistol, bearing serial number RHH046820, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5

(Felon in Possession of a Firearm)

On or about August 25, 2020, in the State and District of Minnesota, the defendant, **JOSHOAMEI DEANGELO RICHARDSON**, a/k/a "Yoshi," a/k/a "Yodaa Ballard," having been previously convicted of the following crime, Crime to Benefit a Gang, in Ramsey County, in or about September 2018, which was punishable by imprisonment for a term exceeding one year, and knowing he had been convicted of least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Sig Sauer, model P320, 9mm semiautomatic pistol, bearing serial number 58B081654, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 6

(Aiding and Abetting Carjacking)

On or about August 25, 2020, in the State and District of Minnesota, the defendants, **JAMES BROCK WILLIAMS, JR.**, a/k/a "Jackboy," a/k/a "J," and **ERIC TROY BALLARD, JR.**, a/k/a "Donk," a/k/a "Lil Donk," a/k/a "Tray Williams," each aiding and abetting, and being aided and abetted by, each other and others known and unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a 2006 black BMW 530i, bearing Minnesota license plate 170 WAU and vehicle identification number WBANE73546CM31811, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of D.D.H., by force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 7

(Aiding and Abetting Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about August 25, 2020, in the State and District of Minnesota, the defendants,

JAMES BROCK WILLIAMS, JR., a/k/a “Jackboy,” a/k/a “J,” and
ERIC TROY BALLARD, JR., a/k/a “Donk,” a/k/a “Lil Donk,” a/k/a “Tray Williams,”
each aiding and abetting, and being aided and abetted by, each other and others known and
unknown to the grand jury, during and in relation to a crime of violence for which they
may be prosecuted in a court of the United States, that is, the crime set forth in Count 6 of
this Superseding Indictment, which is hereby realleged and incorporated herein by
reference, did knowingly and unlawfully use, carry and brandish a firearm, all in violation
of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(ii).

COUNT 8

(Aiding and Abetting Carjacking)

On or about August 25, 2020, in the State and District of Minnesota, the defendants,

JOSHOAMEI DEANGELO RICHARDSON, a/k/a “Yoshi,” a/k/a “Yodaa Ballard,”
JAMES BROCK WILLIAMS, JR., a/k/a “Jackboy,” a/k/a “J,”
ISAIAH STACY ALSTAD, a/k/a “Zay,” a/k/a “Lil Zay,” a/k/a “Zay Money,”
CLIFTON GERMAINE WALKER, JR., a/k/a “K-Killa,” a/k/a “Clif,” and
ERIC TROY BALLARD, JR., a/k/a “Donk,” a/k/a “Lil Donk,” a/k/a “Tray Williams,”
each aiding and abetting, and being aided and abetted by, each other and others known and
unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a
2012 gray Dodge Charger, bearing Minnesota license plate 567 XRT and vehicle
identification number 2C3CDXBG7CH140099, that had been transported, shipped, and
received in interstate and foreign commerce, from the person and presence of R.L.A., by

United States v. Joshoamei Deangelo Richardson, et al.

Criminal No. 20-243 (JRT/HB)

force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 9

(Aiding and Abetting Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about August 25, 2020, in the State and District of Minnesota, the defendants,

JOSHOAMEI DEANGELO RICHARDSON, a/k/a "Yoshi," a/k/a "Yodaa Ballard,"

JAMES BROCK WILLIAMS, JR., a/k/a "Jackboy," a/k/a "J,"

ISAIAH STACY ALSTAD, a/k/a "Zay," a/k/a "Lil Zay," a/k/a "Zay Money,"

CLIFTON GERMAINE WALKER, JR., a/k/a "K-Killa," a/k/a "Clif," and

ERIC TROY BALLARD, JR., a/k/a "Donk," a/k/a "Lil Donk," a/k/a "Tray Williams,"

each aiding and abetting, and being aided and abetted by, each other and others known and unknown to the grand jury, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, the crime set forth in Count 8 of this Superseding Indictment, which is hereby realleged and incorporated herein by reference, did knowingly and unlawfully use, carry and brandish a firearm, all in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(ii).

COUNT 10

(Aiding and Abetting Carjacking)

On or about August 25, 2020, in the State and District of Minnesota, the defendants,

JOSHOAMEI DEANGELO RICHARDSON, a/k/a "Yoshi," a/k/a "Yodaa Ballard,"

JAMES BROCK WILLIAMS, JR., a/k/a "Jackboy," a/k/a "J,"

ISAIAH STACY ALSTAD, a/k/a "Zay," a/k/a "Lil Zay," a/k/a "Zay Money,"

ERIC TROY BALLARD, JR., a/k/a "Donk," a/k/a "Lil Donk," a/k/a "Tray Williams,"

each aiding and abetting, and being aided and abetted by, each other and others known and unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a 2012 blue Subaru Outback, bearing Minnesota license plate CZY 466 and vehicle

United States v. Joshoamei Deangelo Richardson, et al.

Criminal No. 20-243 (JRT/HB)

identification number 4S4BRCKC5C3290256, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of A.M.B., by force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 11

(Aiding and Abetting Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about August 25, 2020, in the State and District of Minnesota, the defendants,

JOSHOAMEI DEANGELO RICHARDSON, a/k/a "Yoshi," a/k/a "Yodaa Ballard,"

JAMES BROCK WILLIAMS, JR., a/k/a "Jackboy," a/k/a "J,"

ISAIAH STACY ALSTAD, a/k/a "Zay," a/k/a "Lil Zay," a/k/a "Zay Money,"

ERIC TROY BALLARD, JR., a/k/a "Donk," a/k/a "Lil Donk," a/k/a "Tray Williams,"

each aiding and abetting, and being aided and abetted by, each other and others known and unknown to the grand jury, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, the crime set forth in Count 10 of this Superseding Indictment, which is hereby realleged and incorporated herein by reference, did knowingly and unlawfully use, carry and brandish a firearm, all in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(ii).

COUNT 12

(Felon in Possession of a Firearm)

On or about August 26, 2020, in the State and District of Minnesota, the defendant,

CLIFTON GERMAINE WALKER, JR., a/k/a "K-Killa," a/k/a "Clif,"

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely,

Crime	Jurisdiction of Conviction	Date of Conviction (in or about)
Terroristic Threats	Hennepin County	November 2016
Fifth-Degree Controlled Substance Poss.	Ramsey County	December 2016
Felon in Possession of a Firearm	Ramsey County	September 2017

and knowing he had been convicted of least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Sig Sauer, model P320, 9mm semiautomatic pistol, bearing serial number 58B081654, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 13

(Unlawful Controlled-Substance User in Possession of a Firearm)

On or about October 12, 2020, in the State and District of Minnesota, the defendant,

JORDAN SYDNEY SHAMAH RHODES, a/k/a “2 3,”

being an unlawful user of any controlled substance, did possess, in and affecting interstate and foreign commerce, the following firearm: a Smith & Wesson, model M&P 9, 9mm semiautomatic pistol, bearing serial number HMY1526, with an extended magazine attached, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 14

(Felon in Possession of a Firearm)

On or about October 12, 2020, in the State and District of Minnesota, the defendant,

ISAIAH STACY ALSTAD, a/k/a “Zay,” a/k/a “Lil Zay,” a/k/a “Zay Money,”

having been previously convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, namely,

Crime	Jurisdiction of Conviction	Date of Conviction (in or about)
Theft of Motor Vehicle	Ramsey County	October 2018
Fifth-Degree Controlled Substance Poss.	Hennepin County	December 2018

and knowing he had been convicted of least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Glock, model 22, .40-caliber semiautomatic pistol, bearing serial number AFR619US, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

Counts 1 through 14 of this Superseding Indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

If convicted of any of Counts 1 through 14 of the Superseding Indictment, the Defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms, accessories (including any magazines), and ammunition, involved in, connected with, or used in any knowing violation of, the offenses alleged, including, but not limited to, (1) a Glock, model 23 Generation 4, .40-caliber semiautomatic pistol, bearing serial number SFS225, (2) an Armscor, model M1911-A1, .45-caliber semiautomatic pistol, bearing serial number RIA1521636, (3) a Ruger, model P97DC, .45-caliber semiautomatic pistol, bearing serial number 66340544, (4) a Remington, model 1911R1, .45-caliber

United States v. Joshoamei Deangelo Richardson, et al.

Criminal No. 20-243 (JRT/HB)

semiautomatic pistol, bearing serial number RHH046820, (5) a Sig Sauer, model P320, 9mm semiautomatic pistol, bearing serial number 58B081654, (6) a Smith & Wesson, model M&P 9, 9mm semiautomatic pistol, bearing serial number HMY1526, with an extended magazine, (7) a Glock, model 22, .40-caliber semiautomatic pistol, bearing serial number GCY345, (8) a Girsan, model MC 1911 SC, .45-caliber semiautomatic pistol, bearing serial number T636819BF00181, (9) a Glock, model 22, .40-caliber semiautomatic pistol, bearing serial number AFR619US, and (10) an SCCY, model CPX-2, 9mm semiautomatic pistol, bearing serial number 442418.

If convicted of any of Counts 6, 8, or 10 of the Superseding Indictment, the Defendants shall forfeit to the United States, pursuant to Title 18 United States Code, Section 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such violations.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 2, 922(g)(1), 922(g)(3), 924(a)(2), 924(c)(1)(A)(ii), 924(d)(1), 924(o), 982(a)(5), and 2119(1), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON